

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREG ABBOTT, in his capacity as
GOVERNOR OF THE STATE OF TEXAS,
and THE STATE OF TEXAS,

Defendants.

Case No. 1:23-cv-00853-DAE

AGREED MOTION TO EXTEND ABEYANCE

The parties request a 45-day extension of the abeyance in this matter. The grounds for this motion are as follows:

1. On February 7, 2025, this Court placed this matter in abeyance to afford the new federal administration time to assess this matter. Dkt. No. 267.
2. Since the United States' unopposed motion to place this case in abeyance was filed, new political leadership—including a new Acting Assistant Attorney General over the Department of Justice Environment and Natural Resources Division—has been appointed at the Department of Justice.
3. Additionally, new leadership has been appointed and is in the process of being appointed at federal client agencies.
4. Undersigned counsel for the United States and their counterparts in the federal client agencies have been briefing the new administration on this matter, including potential next steps.

5. The United States needs additional time to complete these briefings and decide how it believes this case should proceed.

6. Accordingly, the United States requests that the abeyance of proceedings be extended an additional 45 days to allow the United States' internal decision-making process to proceed and allow the parties time to confer on steps forward.

7. Texas concurs in the United States' request that this case be held in abeyance for an additional 45 days. In view of the parties' current and ongoing active cooperation in defense of the southwestern border of the United States and Texas, Texas is hopeful that this additional time may make it possible to resolve this case by agreement, without further discovery or a trial.

Respectfully submitted.

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CERTIFICATE OF SERVICE

I certify that on March 25, 2025, a copy of this filing was served on counsel of record through the Court's electronic filing system.

/s/ Kimere J. Kimball
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